State of Wisconsin Before the Government Accountability Board -9 PM 12: 15

The Response of REPUBLICAN ASSEMBLY CAMPAIGN COMMITTEE

GOVERNMENT OCCUNTABILITY BOARD

Jennifer Toftness, Respondent on behalf of Russell Goodwin

In re: the Nomination Papers of: Candidate Russell Goodwin, 12th Assembly District

Joel Gratz, Complainant

VERIFIED RESPONSE

This response is under Chapter 8 of the Wisconsin Statutes and GAB 2 of the State of Wisconsin Administrative Code. I, Jennifer Toftness allege that:

- 1. I am a resident of the State of Wisconsin, a qualified elector, and the Executive Director of the Republican Assembly Campaign Committee with a mailing address of 148 East Johnson Street, Madison, Wisconsin 53703.
- 2. On June 4, 2014, Joel Gratz, Executive Director of the Assembly Democratic Campaign Committee, submitted a verified complaint to the GAB alleging my nomination papers contained approximately 153 signatures with insufficiencies.

COMPLAINANT FAILS TO PROVIDE SUPPORTING EVIDENCE FOR HIS ALLEGATIONS. THEREFORE, COMPLAINT SHOULD BE DISMISSED.

- 3. GAB Administrative Code 2.05(3)(a) states, in part, the following: "The burden is on the challenger to establish any insufficiency."
- 4. GAB Administrative Code 2.05(5) states the following: "Where it is alleged that the signer or circulator of a nomination paper does not reside in the district in which the candidate being nominated seeks office, the challenger may attempt to establish the geographical location of an address indicated on a nomination paper, by providing district maps, or by providing a statement from a postmaster or other public official."
- 5. Complainant fails to meet the standard established by GAB 2.05(5), and provides no supporting documentation that the signatories listed are outside the 12th Assembly District.
- 6. Complainant further fails to provide the addresses that are allegedly outside the 12th Assembly District.
- 7. Complainant includes several signatories that, through his own admission, are in 12th Assembly District. This includes the following signatories:

- a. Page 1, Line 8: Steve Allyn b. Page 7, Line 10: Khiry Wade
- c. Page 13, Line 6: Casandra Lane
- d. Page 14, Line 7: Alan McSely
- GAB Administrative Code 2.05(4) states, in part, the following: "Any information 8. which appears on a nomination paper is entitled to a presumption of validity."
- Complainant fails to provide any supporting documentation that the alleged 9. signatories reside outside the 12th Assembly District. Therefore, the signatures must be presumed valid, and the challenges to the signatures noted above should be dismissed.

Date: June <u>9</u>, 2014.

I, Jennifer Toftness, being first duly sworn on oath state that I personally read the above response, and that the above statements are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

Republican Assembly Campaign Committee

CERTIFICATE OF SERVICE

I, Jennifer Toftness, hereby certify on this day of June, 2014, a to this complaint was vorwarded via electronic email to the address for c	rue and correct copy of
this complaint was vorwarded via electronic email to the address for	Soel Gratz
on file with the GAB.	0

William Miscoul

STATE OF WISCONSIN

County of Dane

Sworn to before me this

day of June, 2014.

or is permanent

My commission expires